

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

COMMONWEALTH OF PENNSYLVANIA,  
By MICHELLE A. HENRY, ATTORNEY  
GENERAL,

Plaintiff,

v.

FLUENT, LLC d/b/a CAC; AMERICAN PRIZE  
CENTER, LLC; DELIVER TECHNOLOGY, LLC;  
REWARDZONE USA, LLC; and SAMPLES &  
SAVINGS USA, LLC,

Defendants.

**ELECTRONICALLY FILED**

Case No. 2:22-cv-1551-NR

**JOINT STATUS REPORT**

The Commonwealth of Pennsylvania, by Attorney General Michelle A. Henry (“Commonwealth” or “Plaintiff”) and Defendants Fluent, LLC, American Prize Center, LLC, Deliver Technology, LLC, RewardZone USA, LLC, and Samples & Savings USA, LLC (collectively, “Fluent”) respectfully submit the following Joint Status Report.

Per the Court’s Text Order of March 22, 2023, counsel has been directed to file a Joint Status Report “updating the Court on the status of settlement discussions, including whether a settlement agreement has been reached and, if not, whether the parties have a mutual interest in engaging in private mediation.” ECF No. 24.

The Parties have reached a settlement in principle with respect to all of the claims in this action and are coordinating on finalizing documentation for submission to the Court.

DATE: May 8, 2023

Respectfully submitted,

<p>COMMONWEALTH OF PENNSYLVANIA OFFICE OF ATTORNEY GENERAL</p> <p>MICHELLE A. HENRY ATTORNEY GENERAL</p> <p>BY: <u>/s/ Amy L. Schulman</u> Amy L. Schulman Senior Deputy Attorney General (PA ID No. 88088) Attorney for the Commonwealth Office of Attorney General 1251 Waterfront Place, Mezzanine Level Pittsburgh, Pennsylvania 15222 Phone: 412-565-3523 Email: <a href="mailto:aschulman@attorneygeneral.gov">aschulman@attorneygeneral.gov</a></p> <p><i>Counsel for Plaintiff Commonwealth of Pennsylvania, Office of Attorney General</i></p>	<p>MORGAN, LEWIS &amp; BOCKIUS LLP</p> <p>BY: <u>/s/ John K. Gisleson</u> John K. Gisleson, Esq. (PA62511) Steven N. Hunchuck, Esq. (PA327892) Morgan, Lewis &amp; Bockius LLP One Oxford Centre Thirty-Second Floor 301 Grant Street Pittsburgh, PA 15219 (412) 560-3300 (telephone) (412) 560-7001 (facsimile) <a href="mailto:john.gisleson@morganlewis.com">john.gisleson@morganlewis.com</a> <a href="mailto:steven.hunchuck@morganlewis.com">steven.hunchuck@morganlewis.com</a></p> <p>Daniel S. Savrin, Esq. (<i>admitted pro hac vice</i>) Caiti A. Zeytoonian, Esq. (<i>admitted pro hac vice</i>) Morgan, Lewis &amp; Bockius LLP One Federal Street Boston, MA 02110 (617) 341-7700 (telephone) (617) 341-7701 (facsimile) <a href="mailto:daniel.savrin@morganlewis.com">daniel.savrin@morganlewis.com</a> <a href="mailto:caiti.zeytoonian@morganlewis.com">caiti.zeytoonian@morganlewis.com</a></p> <p><i>Counsel for Defendants Fluent, LLC; American Prize Center, LLC; Deliver Technology, LLC; Rewardzone USA, LLC; and Samples &amp; Savings USA, LLC</i></p>
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